

Clint Odom  
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April 8, 2002

**Ex Parte**

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
445 12th St., S.W. – Portals  
Washington, DC 20554

*RE: Application by Verizon-New Jersey Inc. for Authorization To Provide In-Region,  
InterLATA Services in the State of New Jersey, WC Docket No. 02-67 -- REDACTED*

Dear Mr. Caton:

On Thursday, April 4, 2002, K. Zacharia, L. Owsley, S. Angstreich, K. McLean, J. Smith, R. Wierzbicki and C. Odom of Verizon met with B. Olson, A. Johns, J. Miller, R. McDonald, R. Tanner, B. Childers, G. Cohen, R. Remy and S. Herauf of the Wireline Competition and Enforcement Bureau staff to discuss the above application, and specifically to discuss claims raised by MetTel regarding the performance of Verizon's operations support systems. In addition, Verizon provided answers to staff's questions pertaining to the data presented on the performance trend reports and on the CLEC-specific performance reports filed with Verizon's application. Verizon explained that the data on the performance trend reports is based on the officially filed Carrier-to-Carrier reports and will be revised after Verizon refiles the Carrier-to-Carrier reports with the New Jersey Board of Public Utilities. Verizon also explained that the business rules in New Jersey, as in other states, do not require Verizon to provide CLEC-specific flow-through data on the CLEC-specific Carrier-to-Carrier reports. In addition, Verizon discussed its performance on certain measurements, as requested by staff. Finally, in response to a question from staff, Verizon explained that the 2-hour benchmark for returning LSRCs and rejects only applies to orders that actually flow through.

Verizon provided the staff with the attached handouts during the meeting. The first three handouts, pertaining to the claims raised by MetTel, contain proprietary information and have been redacted. A confidential version containing these handouts has been filed. The fourth handout, pertaining to the other matters discussed at the meeting, does not contain proprietary information. The twenty-page limit does not apply as set forth in DA 02-718. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clint E. Odom".

Attachment

**REDACTED – FOR PUBLIC INSPECTION**

cc: Brent Olson  
Alex Johns  
Jeremy Miller  
Susan Pie

<b>Function:</b>		
<b>OR-4 Timeliness of Completion Notification</b>		
<b>Definition:</b>		
Refer to the <i>Definition</i> listed next to each OR-4 sub-metric (OR-4-11, OR-4-16, and OR-4-17) for a description of the measurement included in the sub-metrics.		
<b>Exclusions:</b>		
<ul style="list-style-type: none"> <li>Verizon Test Orders</li> <li>Orders not received through the Verizon Netlink EDI system. This includes orders transmitted manually, orders received through the VAN EDI system, and orders submitted through the WEB GUI.</li> <li>VADl orders</li> <li>For sub-metric OR-4-11 only the following additional exclusion applies: Any product that is not designed to generate a PCN and a BCN.</li> </ul>		
<b>Performance Standard:</b>		
<p>For sub-metric OR-4-11: 0.25% of PONs that received neither a PCN nor a BCN within two (2) business days from the SOP posting of the provisioning of the last service order associated with a specific PON.</p> <p>For sub-metric OR-4-16: 95% of PCNs sent within one (1) business day.</p> <p>For sub-metric OR-4-17: 95% of BCNs sent within two (2) business days.</p>		
<b>Report Dimensions</b>		
<b>Company:</b> <ul style="list-style-type: none"> <li>CLEC Aggregate <sup>13</sup></li> <li>CLEC Specific</li> </ul>		<b>Geography:</b> <ul style="list-style-type: none"> <li>Maine</li> </ul>
<b>Sub-Metrics Timeliness of Completion Notification</b>		
OR-4-01 through OR-4-10	<b>Metrics Not in Use in Verizon North.</b>  Note: OR-4-09 is not reported in the C2C reports.	
OR-4-11	<b>% Completed orders with neither a PCN nor BCN sent</b>	
<b>Description:</b>	The percent of EDI PONs for which the last service order has been <i>provisioning completed</i> in the Verizon Service Order Processing (SOP) system. The elapsed time begins with the Provisioning completion in SOP of the last service order associated with a specific PON. The PCN and the BCN are considered sent when the Verizon Netlink system initiates the send of the completed notifier to the CLEC. The notifier is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to transmission to the CLEC. If no PCN and no BCN have been sent in two (2) business days after <i>provisioning completion</i> , the order will be captured in this measure.	
<b>Product:</b>	CLEC Aggregate <ul style="list-style-type: none"> <li>EDI</li> </ul>	
<b>Calculation:</b>	<b>Numerator:</b> Number of EDI PONs completed that have produced neither a PCN nor a BCN within two (2) business days after the last service order has been updated as <i>provisioning completed</i> in SOP.	<b>Denominator:</b> Total number of EDI PONs for which the last service order has been updated as <i>provisioning completed</i> in SOP in a month.

<sup>13</sup> Excludes Verizon Advanced Data Incorporated

<b>Function:</b>		
<b>OR-5 Percent Flow-Through</b>		
<b>Definition:</b>		
This metric measures the percent of valid orders (LSRs) received through the electronic ordering interface (example includes: Request Manager) that processed directly to the legacy Service Order Processor system (SOP) without manual intervention. These Service Orders require no action by a VZ service representative to input an order into SOP. This is also known as Ordering flow-through.		
<b>Simple Flow-through:</b> Percent of Basic POTS Services ( <i>excluding Centrex</i> ) that actually flow-through from DCAS to SOP.		
<b>% Flow-through Achieved:</b> Percent of valid orders received through the electronic ordering interface (DCAS or Request Manager) that are designed to flow-through and actually flow-through, but excluding those orders that do not flow-through due to CLEC errors.		
Appendix H contains a summary of order types that flow-through for VZ and CLECs. Orders designed to flow-through may also fall-out for both VZ and CLECs. Non-flow-throughs include orders that require manual intervention to ensure that the correct action is taken.		
<b>Note:</b> Rejected Orders (orders failing basic front-end edits) submitted via LSR are not placed in the PON Master File; therefore, they are not included in the calculation. ASRs do not flow-through by design, and are not included in the OR-5 metric..		
<b>Exclusions:</b>		
<ul style="list-style-type: none"> <li>• VZ Test Orders</li> <li>• Verizon Advanced Data Incorporated (VADI)</li> </ul>		
From Achieved Flow-through:		
<ul style="list-style-type: none"> <li>• Orders not eligible to flow-through <ul style="list-style-type: none"> <li><b>Note:</b> Order types that are designed to flow-through are specified in the scenarios documented in Appendix H.</li> </ul> </li> <li>• Orders with CLEC input errors in violation of published business rules</li> </ul>		
<b>Performance Standard:</b>		
OR-5-01: No standard developed for total flow-through		
OR-5-03: 95% for % flow-through achieved.		
<b>Report Dimensions</b>		
Company:		Geography:
<ul style="list-style-type: none"> <li>• CLEC Aggregate</li> </ul>		<ul style="list-style-type: none"> <li>• Maine</li> </ul>
<b>Sub-Metrics</b>		
<b>OR-5-01</b>	<b>% Flow-through -- Total</b>	
Products	Resale	UNE
Calculation	Numerator	Denominator
	Sum of all orders that flow-through for specified product.	Total number of LSR records (orders) for specified product.
<b>OR-5-02</b>	<b>Metric not in use in Verizon North</b>	
<b>OR-5-03</b>	<b>% Flow-through Achieved</b>	
Products	Resale	UNE
Calculation	Numerator	Denominator
	Number of orders that flow-through for specified product.	Number of flow-through eligible orders.

Metric OR-4-10: 95% within 2 business days of SOP completion.  
Metric OR-4-11: Not more than 5%.

### Report Dimensions

#### Company:

- Verizon Retail (Metrics OR-4-06, 07 and 08)
- CLEC Aggregate
- CLEC Specific
- Verizon Affiliate Aggregate
- Verizon Affiliate Specific

#### Geography:

- State

### Sub-Metrics

#### OR-4-01 Completion Notice – Average Response Time

Products	Resale	UNE
Calculation	<b>Numerator</b>	<b>Denominator</b>
	Sum of notification date and time less CRIS bill completion date and time.	Total number of completion notices for specified product.

#### OR-4-02 Completion Notice – % On Time

Products	Resale	UNE
Calculation	<b>Numerator</b>	<b>Denominator</b>
	Number of completion notices where notice occurs on or before noon the business day after bill completion.	Number of PONs for specified product with ON-TIME-NOTFCTN of ORDERING-MASTER-RECORD = 'Y' or 'N'.

#### OR-4-03 Intentionally omitted

Products		
Calculation	<b>Numerator</b>	<b>Denominator</b>

#### OR-4-04 Work Completion Notice – Average Response Time

Products	Resale	UNE
Calculation	<b>Numerator</b>	<b>Denominator</b>
	Sum of notification date and time less SOP completion date and time for specified product.	Total number of SOP completion notices for specified product.

#### OR-4-05 Work Completion Notice – % On Time

Products	Resale	UNE
Calculation	<b>Numerator</b>	<b>Denominator</b>
	Number of SOP completion notices where notice occurs on or before noon the business day after SOP completion for specified product.	Number of PONs for specified product with ON-TIME-NOTFCTN of ORDERING-MASTER-RECORD = 'Y' or 'N'.

#### OR-4-06 Average Duration – Work Completion (SOP) to Bill Completion

Products	Retail	Resale	UNE
Calculation	<b>Numerator</b>	<b>Denominator</b>	
	Sum of date and time for Bill completion less date and time for SOP completion.	Number of orders with SOP and Bill Completions.	

#### OR-4-07 % SOP to Bill Completion ≥ 5 Business Days

Products	Retail	Resale	UNE
Calculation	<b>Numerator</b>	<b>Denominator</b>	

<b>Function:</b>		
<b>OR-5 Percent Flow-Through</b>		
<b>Definition:</b>		
<p><b>Total Flow-Through:</b> The percentage of valid orders received through the electronic ordering interfaces (EDI, Web GUI) and processed directly to the legacy service order processor ("SOP") without manual intervention. These service orders require no action by a Verizon service representative to type an order into the Service Order Processor. This is also known as "ordering" flow-through.</p> <p><b>Simple Flow Through:</b> The percentage of valid orders for Basic POTS Services (excludes Centrex) received through the electronic ordering interfaces (EDI, Web GUI) and processed directly to the legacy service order processor ("SOP") without manual intervention.</p> <p><b>% Flow Through Achieved:</b> The percentage of valid orders received through the electronic ordering interface (EDI, Web GUI) that are designed to flow through that actually do flow through, but excluding those orders that do not flow through due to CLEC errors.</p> <p>A summary of order types that are designed to Flow-Through for CLECs is included in Appendix G. Orders designed to Flow-Through may also fall out. Non-Flow Through orders include orders where manual intervention is required to ensure that the correct action is taken.</p> <p>Note: Edit Rejects – Orders failing "Basic front-end edits" are not placed on PON Master File.</p>		
<b>Exclusions:</b>		
<ul style="list-style-type: none"> <li>• Verizon Test Orders</li> <li>• Orders that are not submitted through a Verizon electronic ordering interface (e.g., orders submitted by U.S. Mail, private delivery service, or Fax)</li> <li>• CLEC Aggregate excludes Verizon Affiliate data.</li> </ul> <p>Metric OR-5-03:</p> <ul style="list-style-type: none"> <li>• Orders not eligible to flow through</li> <li>• Orders with CLEC input errors in violation of published business rules</li> </ul>		
<b>Performance Standard:</b>		
OR-5-01 and 02: No Standard.		
OR-5-03: 95%.		
<b>Report Dimensions:</b>		
Company:		Geography:
• CLEC Aggregate		• State
<b>Sub-Metrics:</b>		
<b>OR-5-01</b>	<b>% Flow Through – Total</b>	
<b>Products:</b>	Resale	UNE
<b>Calculation:</b>	<b>Numerator</b>	<b>Denominator</b>
	Sum of all orders that flow through for specified product.	Total number of LSR/ASR <sup>18</sup> records (orders) for specified product.
<b>OR-5-02</b>	<b>% Flow Through – Simple</b>	
<b>Products:</b>	Resale	UNE
<b>Calculation:</b>	<b>Numerator</b>	<b>Denominator</b>
	Sum of all orders that flow through for specified product (less CENTREX, Complex and Specials).	Total number of LSR/ASR <sup>18</sup> records (orders) for specified product (less CENTREX, Complex and Specials).
<b>OR-5-03</b>	<b>% Flow Through Achieved</b>	
<b>Products:</b>	Resale	UNE

<sup>18</sup> Local Service Request/Access Service Request

<sup>19</sup> Local Service Request/Access Service Request

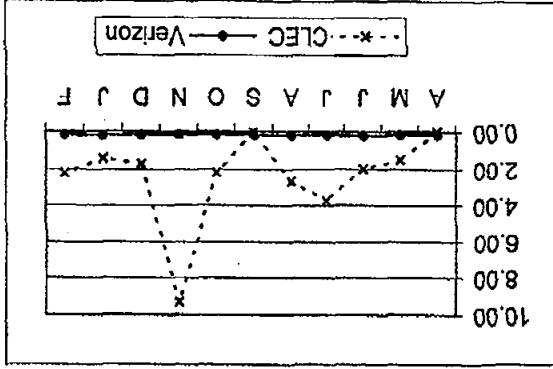
**NEW JERSEY  
ACHIEVED FLOW THROUGH PERFORMANCE  
(NJ Resale and Total UNE from C2C - UNE Platform and UNE Other from Special Study)**

NEW JERSEY							
	August 2001	September 2001	October 2001	November 2001	December 2001	January 2002	February 2002
Resale	%	79.36%	84.18%	79.85%	94.20%	93.81%	94.77%
Resale	Volume	20,758	16,943	19,443	19,339	16,629	22,758
Total UNE	%	63.27%	74.07%	86.84%	82.83%	77.93%	85.34%
Total UNE	Volume	4,144	3,937	5,044	4,559	5,509	5,012
UNE Platform	%	54.03%	58.81%	78.37%	76.63%	77.93%	79.82%
UNE Platform	Volume	1,216	1,146	1,526	1,844	2,311	2,508
UNE Other	%	67.11%	81.15%	90.51%	87.03%	77.92%	80.85%
UNE Other	Volume	2,928	2,791	3,518	2,715	3,198	2,504
							2,418

# MR-2 - Trouble Report Rate

MR-2-01-3200 Network Trouble Report Rate - Total Party with VZ Retail

VZ Vol	CLEC Vol	SLDev	Samper	ZScore
484391	483465	52	0.54	0.28
488588	483465	68	0.48	-2.70
488588	483465	102	0.45	-3.89
488420	483465	80	0.44	-8.14
486357	483465	75	0.49	-5.10
482635	483465	55	0.54	0.30
481581	483465	46	0.58	-3.49
479000	483465	43	0.56	-16.37
370471	483465	883	0.13	-11.55
369454	483465	916	0.15	-8.39
366448	483465	1038	0.13	-16.21



Dec - Feb

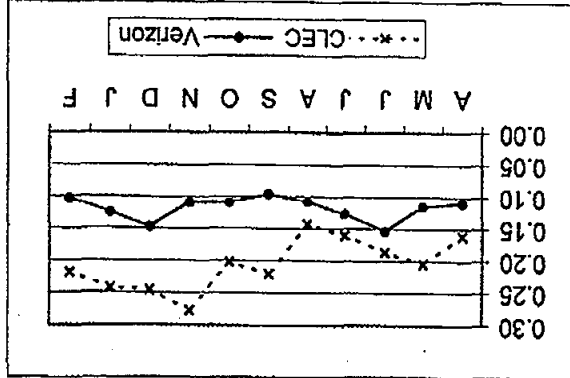
1.80



MR-2 - Trouble Report Rate  
 cont...  
 Network Trouble Report Rate - Central Office - Platform  
 Partly with VZ Retail

MR-2-03-3140	VZ Vol	CLEC Vol	StdDev	Sample	ZScore
Apr-01	6372317	2477		0.07	-0.78
May-01	6362235	2934		0.06	-1.43
Jun-01	6256009	3755		0.06	-0.52
Jul-01	6241480	4987		0.05	-0.67
Aug-01	6250771	7669		0.04	-0.96
Sep-01	6246652	9048		0.03	-3.86
Oct-01	6221607	12859		0.03	-3.17
Nov-01	6198608	16594		0.03	-6.56
Dec-01	6170954	20713		0.03	-3.68
Jan-02	6149165	25893		0.02	-5.41
Feb-02	6129823	33365		0.02	-6.54

Dec - Feb 0.13 0.23 0.11  
 Apr - Feb 0.12 0.22 0.11



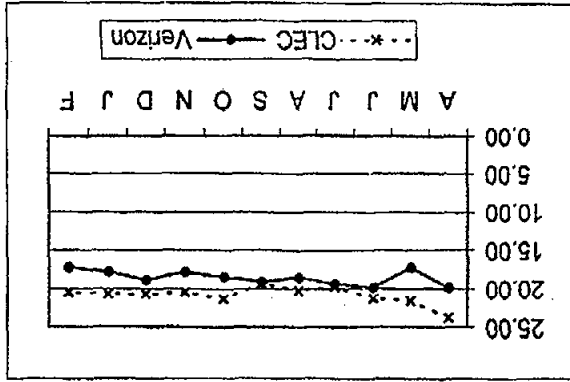


# MR-5 - Repeat Trouble Reports

MR-5-01-2100		% Repeat Reports within 30 Days					Party with VZ Retail	
		VZ Vol	CLEC Vol	SIDev	SamplEr	ZScore		
Apr-01	18.64	87352	2546	0.80	0.80	-4.91		
May-01	18.64	91928	2311	0.80	0.80	-5.55		
Jun-01	18.64	96822	2673	0.78	0.78	-1.95		
Jul-01	18.64	82220	2170	0.86	0.86	-0.37		
Aug-01	18.64	93139	2354	0.81	0.81	-2.07		
Sep-01	18.64	76546	1863	0.92	0.92	-0.16		
Oct-01	18.64	73077	1973	0.89	0.89	-3.25		
Nov-01	18.64	62264	1611	0.97	0.97	-2.75		
Dec-01	18.64	69393	1576	1.00	1.00	-1.88		
Jan-02	18.64	65968	1867	0.90	0.90	-3.23		
Feb-02	18.64	57297	1529	0.98	0.98	-3.32		

Dec - Feb		18.03	20.66	2.63
Apr - Feb		18.64	20.99	2.35

Verizon		CLEC	
- - - x - - -		- - - x - - -	
A M J J A S O N D J F		A M J J A S O N D J F	
0.00		0.00	
5.00		5.00	
10.00		10.00	
15.00		15.00	
20.00		20.00	
25.00		25.00	

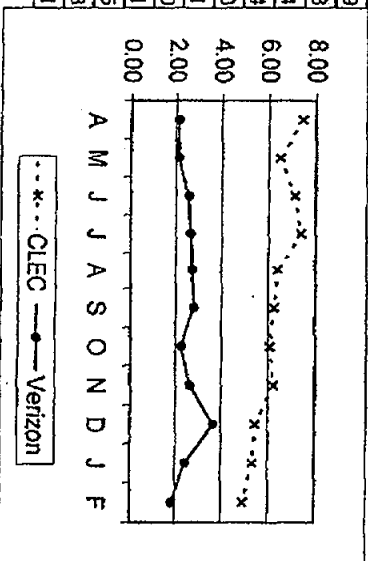


# PR-2 - Average Completed Interval

PR-2-01-3111	Average Interval Completed - Total No Dispatch - Hot Cut Loop						Partly with VZ Retail	
	VZ Vol	CLEC Vol	SIDrv	Sampler	ZScore			
Apr-01	15814	377	3.06	0.16	-33.49			
May-01	19276	562	4.15	0.18	-24.83			
Jun-01	18060	299	3.63	0.21	-21.64			
Jul-01	16222	181	3.97	0.30	-16.04			
Aug-01	17343	322	4.05	0.23	-16.20			
Sep-01	13967	270	5.70	0.35	-9.91			
Oct-01	18533	646	4.80	0.19	-19.90			
Nov-01	13148	358	5.26	0.28	-12.81			
Dec-01	14425	174	7.54	0.58	-3.15			
Jan-02	15457	88	5.96	0.64	-4.58			
Feb-02	16237	72	4.06	0.48	-6.51			

Dec - Feb

5.33



because most CLECs do not have the ability to test their own circuits. All of the steps of the hot cut process are set forth in Attachment 11.

93. Verizon has continued to work with the industry since the time of the New York proceeding to make further improvements to the hot cut process. For example, Verizon and several CLECs have developed a process to perform multiple hot cuts on a project basis. This approach helps to eliminate numerous phone calls between Verizon and the serving CLEC, and to ensure end user satisfaction. Verizon has also developed a web-based system to track and manage hot cut orders that virtually eliminates the need to place multiple phone calls between Verizon and the CLEC.

94. Verizon's hot cut performance in New Jersey is excellent. During August, September and October 2001, Verizon completed, on average, 97.42 percent of its hot cut orders on time. *See* Attachment 12.

95. As previously explained, the New York PSC has decided to eliminate average interval completed measures from the Carrier-to-Carrier Performance Reports. These changes will be implemented in Carrier-to-Carrier Performance Reports for New York and Massachusetts beginning with the November 2001 report month and should likewise be implemented in New Jersey. There is no reason for the Commission to consider or rely upon these measures. Nonetheless, these measures show that Verizon is provisioning hot cut loops in a timely manner. During August, September and October 2001, Verizon completed hot cuts in New Jersey within, on average, 6.20 days, which is just slightly longer than the standard six day interval for orders of 1-9 lines. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/DeVito Decl., Att. 1).

96. The New Jersey Carrier-to-Carrier Performance Reports include a retail comparison group for hot cut average interval completed performance. This retail comparison group is completely inappropriate because it includes orders for feature changes with a standard interval of one or two days. *See* Guerard/Canny/DeVito Decl.

97. Verizon's installation quality performance for hot cuts is not reported on New Jersey Carrier-to-Carrier Performance Reports. Nonetheless, Verizon has calculated its hot cut installation quality performance under the New York guidelines (troubles reported within 7 days of installation) and those calculations show that Verizon's hot cut installation quality performance is excellent. During August, September and October 2001, 0.46 percent of CLEC hot cuts had reported troubles within 7 days of installation. *See* Attachment 13.

c. High Capacity Loops

98. Verizon offers CLECs unbundled access to high capacity (DS-1 and DS-3) loops in New Jersey in the same manner as in the other Verizon states the FCC has found to be checklist-compliant. High capacity loops are available in New Jersey under interconnection agreements. *See* Attachment 1.

99. As of October 2001, Verizon has provisioned about 190 high capacity DS-1 loops, and no high capacity DS-3 loops in New Jersey. High capacity loops in New Jersey represent only about 0.2 percent of all unbundled loops provisioned to competitors.

100. During August, September and October 2001, Verizon provisioned only about 25 DS-1 loops per month in New Jersey. With so few orders, Verizon's monthly

# MR-5 - Repeat Trouble Reports

MR-5-01-3341		% Repeat Reports within 30 Days					Party with VZ Retail	
		VZ Vol	CLEC Vol	Sidev	SamplEr	ZScore		
Apr-01	13	630	71		4.57	-0.53		
May-01	29	641	101		4.15	-2.48		
Jun-01	30	701	105		3.95	-2.86		
Jul-01	15	589	51		5.12	-2.94		
Aug-01	14	647	51		5.42	-1.98		
Sep-01	15	615	40		5.87	-2.08		
Oct-01	11	718	42		6.42	-0.13		
Nov-01	7	508	32		6.28	-1.29		
Dec-01	4	487	27		7.06	0.03		
Jan-02	5	482	35		6.20	0.07		
Feb-02	9	475	22		8.16	-2.39 (P)		

